

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
CIVIL DIVISION**

JESSE LADON STRICKLAND,

PLAINTIFF,

VS.

**TIMOTHY LASHAWN WILLIAMS and
EVERGREEN TIMBER, INC.**

DEFENDANTS.

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Case No. 2:07-CV-705

PLAINTIFF'S MOTION TO TRANSFER

Plaintiff concedes the Court lacks jurisdiction in view of the fact that the individual Defendant moved to Georgia four months prior to the filing of the suit. According to the pleading filed by the individual Defendant he is a resident of Clay County, Georgia and the corporate Defendant is based in Randolph County, Georgia which are both in the Columbus Division of United States District Court for the Middle District of Georgia, counsel respectfully requests that the Court enter an order transferring the case to that Court pursuant to the authority of 28 U.S.C. § 1404(a). This court has broad discretion to transfer a civil action to any other district or division where it may have been brought. Patterson v. Western Auto Supply Co., 991 F. Supp. 1319 (M.D. Ala. 1997). In further support of this motion counsel would show unto the Court that the Plaintiff remains under the care of Dr. Flandry of Columbus, Georgia, who has performed one surgery and anticipates performing additional surgery on the Plaintiff after March of 2008.

/s/ David W. Rousseau

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CERTIFICATE OF SERVICE

I do hereby certify that I have on this 24th day of August 2007, I electronically filed the foregoing with the Clerk of Court to the following:

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